DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
10903 New Hampshire Avenue
Document Control Center – WO66-G609
Silver Spring, MD 20993-0002

September 3, 2014

Genesys Spine
Mr. Brian J. Bergeron
Vice President of Engineering
1250 Capital of Texas Highway South
Building Three, Suite 600
Austin, Texas 78746

Re: K133911
Trade/Device Name: Genesys Spine Anterior Buttress Plate System
Regulation Number: 21 CFR 888.3060
Regulation Name: Spinal intervertebral body fixation orthosis
Regulatory Class: Class II
Product Code: KWQ
Dated: July 29, 2014
Received: August 5, 2014

Dear Mr. Bergeron:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set

forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

Sincerely yours,

Ronald P. Jean -S for

Mark N. Melkerson
Director
Division of Orthopedic Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Food and Drug Administration

Indications for Use

Form Approved: OMB No. 0910-0120
Expiration Date: January 31, 2017
See PRA Statement below.

510(k) Number *(if known)*
K133911

Device Name
Genesys Spine Anterior Buttress Plate System

Indications for Use *(Describe)*
The Genesys Spine Anterior Buttress Plate system in conjunction with traditional rigid fixation is intended for use in spinal fusion procedures as a means to maintain the relative position of weak bony tissue such as allografts or autografts. This device is not intended for load bearing applications.

Type of Use *(Select one or both, as applicable)*

☒ Prescription Use (Part 21 CFR 801 Subpart D) ☐ Over-The-Counter Use (21 CFR 801 Subpart C)

PLEASE DO NOT WRITE BELOW THIS LINE – CONTINUE ON A SEPARATE PAGE IF NEEDED.

FOR FDA USE ONLY

Concurrence of Center for Devices and Radiological Health (CDRH) *(Signature)*

This section applies only to requirements of the Paperwork Reduction Act of 1995.

DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.

The burden time for this collection of information is estimated to average 79 hours per response, including the time to review instructions, search existing data sources, gather and maintain the data needed and complete and review the collection of information. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, to:

Department of Health and Human Services
Food and Drug Administration
Office of Chief Information Officer
Paperwork Reduction Act (PRA) Staff
PRAStaff@fda.hhs.gov

"An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB number."

5. 510(K) SUMMARY

Submitter's Name:	Genesys Spine
Submitter's Address:	1250 Capital of Texas Highway South Building Three, Suite 600 Austin, Texas 78746
Submitter's Telephone:	512-381-7071
Submitter's Fax:	512-381-7076
Contact Name:	Brian J. Bergeron
Date Summary was Prepared:	July 29, 2014
Trade or Proprietary Name:	Genesys Spine Anterior Buttress Plate System
Common or Usual Name:	Spinal Intervertebral Body Fixation Orthosis
Classification:	Class II per 21 CFR §888.3060
Product Codes:	KWQ
Classification Panel:	Orthopedic and Rehabilitation Devices Panel

DESCRIPTION OF THE DEVICE SUBJECT TO PREMARKET NOTIFICATION:

The Genesys Spine Anterior Buttress Plate System will be offered in various device configurations based on surgical approach and patient anatomy, and will consist of a Genesys Spine buttress plate and screws that are inserted into the anterior surface of adjacent lumbar vertebrae.

INDICATIONS FOR USE

The Genesys Spine Anterior Buttress Plate system in conjunction with traditional rigid fixation is intended for use in spinal fusion procedures as a means to maintain the relative position of weak bony tissue such as allografts or autografts. This device is not intended for load bearing applications.

TECHNICAL CHARACTERISTICS

The Genesys Spine Anterior Buttress Plate System is comprised of multiple sizes of plates and screws that are inserted into the anterior surface of adjacent lumbar vertebrae. The device is applied after discectomy and insertion of autograft or allograft in the interbody space, and acts to stabilize the spine during fusion.

The plate components are manufactured from medical grade Ti-6Al-4V ELI titanium alloy per ASTM F-136. Additionally, plates contain a securement tab component comprised of medical grade Ti-6Al-4V ELI titanium alloy per ASTM F-136 to ensure that the screw is locked in place. The bone screws are manufactured from medical grade Ti-6Al-4V ELI titanium alloy per ASTM F-136.

PERFORMANCE DATA

The predetermined pass-fail criterion was that the mechanical test results for the Genesys Spine Anterior Buttress Plate System be equivalent to (or greater than) previously cleared anterior buttress plate systems. Prior to performing mechanical testing, all possible configurations of the Anterior Buttress Plate System construct were analyzed in order to determine the worst case to be used for testing. Static and dynamic cantilever bending testing in accordance with American Society for Testing and Materials (ASTM) F1717 “Standard Test Methods for Static and Fatigue for Spinal Implant Constructs in a Vertebrectomy Model” were then performed on the worst case Anterior Buttress Plate System construct.

CONCLUSION

The overall technological characteristics and mechanical performance data lead to the conclusion that the Genesys Spine Anterior Buttress Plate System is substantially equivalent to the Black Widow Anterior Buttress Plate (Omni Spine - K081770), BOWTI Anterior Buttress Staple System (Depuy Acromed – K021039), and Butrex Buttress Plating System (X-Spine, Inc. - K072943).